

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

March 25, 2022

Via ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 3/25/2022

MEMO ENDORSED

Re: *United States v. Pedro Nunez*, 21 CR 612 (ER)

Dear Judge Ramos:

With the consent of Pretrial Services and without objection from the government (who takes no position), I write to seek a modification of Mr. Nunez's bail condition. Specifically, I ask that Mr. Nunez no longer be subject to a curfew condition.

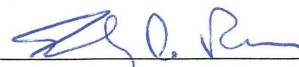
Mr. Nunez has been at liberty subject to bail conditions since his presentment on September 8, 2021. On December 22, 2021, with the consent of Pretrial Services and the government, Mr. Nunez's level of supervision was reduced from home detention to a curfew. Since then, Mr. Nunez has complied with the curfew condition. However, Mr. Nunez is employed at a small grocery store and the curfew condition interferes with his ability to work "double shifts" on short notice or take on other later-evening employment. As such, we ask that the condition be terminated.

Thank you.

Respectfully submitted,
/s/ Julia Gatto
Julia L. Gatto, Esq.
Assistant Federal Defender
212-417-8750

cc: Kedar Bhatia, Esq. (via ECF)
USPO Francesca Piperato (via ECF)

The application is X granted
_____ denied



Edgardo Ramos, U.S.D.J

Dated: 3/25/2022

New York, New York